



THE CITY OF NEW YORK
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March 7, 2023

By ECF

Honorable Paul A. Engelmayer
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *Saleem Ahmad, et al. v. New York City Health & Hospitals Corp. et al.*
20-cv-00675 (PAE)
Our No. 2020-007695

Dear Judge Engelmayer:

I am an Assistant Corporation Counsel in the Office of Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, attorney for New York City Health & Hospitals Corporation ("H+H"), Ebone Carrington, and Hinnah Farooqi (together, "defendants") in the above-referenced action. I write on behalf of all parties to respectfully request an adjournment of the pre-motion conference, currently scheduled for March 9, 2023, until after the conclusion of their settlement discussions before Magistrate Judge Willis.

This extension is requested to permit the parties to continue to attempt to resolve this action without further significant intervention by this Court. To that end, yesterday, March 6, 2023, defendants reached an agreement in principle with one of the plaintiffs, Syed Kazmi. The parties are currently working to provide Magistrate Judge Willis with dates to continue settlement discussions with regard to a second plaintiff and expect to schedule additional conferences with regard to the remaining plaintiffs thereafter. This additional time will afford the parties the necessary time to continue to engage in meaningful settlement negotiations.

Further, defendants note for the Court that I presently expect to be leaving my employment with the Law Department on March 8, 2023. My colleagues Laura Williams and Lauren Silver will continue to represent defendants in this action. Both Ms. Williams and Ms.

Silver are presently scheduled to begin a trial before Judge Liman in *Heiden v. H+H, et al.*, 20 Civ. 10288, on Monday, April 17, 2023.

Accordingly, the parties respectfully request that the Court adjourn the pre-motion conference until after the conclusion of settlement negotiations before Magistrate Judge Willis. The parties will update the Court in 30 days regarding the status of their settlement negotiations.

Thank you for your consideration of this request.

Respectfully Submitted,

s/ Aliza J. Balog

Aliza J. Balog
Assistant Corporation Counsel

cc: Counsel of Record (By ECF)

The Court adjourns the case management conference to Monday, April 10, 2023 at 4 p.m. The parties are directed to file, by April 5, 2023, an update as to the status of settlement negotiations. SO ORDERED.



PAUL A. ENGELMAYER
United States District Judge
March 7, 2023